<div align="center">REMARKS</div>

I.   Introduction

In response to the Office Action dated April 8, 2005, claims 2, 11, and 20 have been

cancelled, claims 1, 10, and 19 have been amended, and claims 28-30 have been added. Claims 1, 3-

10, 12-19, and 21-30 remain in the application. Re-examination and re-consideration of the

application, as amended, is requested.

II.   Prior Art Rejections

On page (2) of the Office Action, claims 1, 3-10, 12-19, and 21-27 were rejected under 35

U.S.C. §103(a) as being unpatentable over Jones et al., U.S. Patent No. 6,493,731 (Jones), in view of

Thackston, U.S. Patent No. 6,295,513.. On page (5) and (6) of the Office Action, claim 2 was

rejected under 35 U.S.C. §103(a) as being unpatentable over Jones in view of Thackston as applied

to Claims 1, 3-10, 12-19, and 21-27 above, and further in view of Serbinis et al, U.S. Patent No.

6,584,466 (Serbinis).

The independent claims were rejected as follows:

> As to claim 1, Jones teaches a method for distributing design document changes comprising:
> Capturing a representation of a revision block of a document, wherein the revision block
> documents a history of changes to the document (capturing metadata which are stored as resources to
> track revision and history in a document; column 4, lines 33-45; column 5, lines 11-26; column 6, lines
> 23-40); and
> Distributing the representation via a network services (the resources are available on a
> collaborative network; column 4, lines 33-59).
> Jones does not teach a design document. Thackston teaches a design document. See
> column 8, lines 45-60. It would have been obvious to a person of ordinary skill in the art at the time
> of the invention to combine the document of Jones with the design document of Thackston. A
> person of ordinary skill in the art would have been motivated to do this because Jones supports the
> execution of a work process operating in a collective working environment of any business (column 4,
> lines 38-45).
> ...
> Claims 10-18 and 19-27 are rejected under the same rationale as claims 1-9 because they
> have the same limitations are claims 1-9.

Original dependent claims 2, 11, and 20 were rejected as follows:

> Jones and Thackston teach the method of claim 1, wherein the representation is an metadata
> representation (the metadata is stored in the document or outside the document, the metadata is
> information about the document; column 5, lines 20-26; column 6, lines 22-41). Jones and Thackston
> do not teach a XML representation. Serbinis teaches an XML representation. See column 15, lines
> 45-67; column 16, lines 1-10. It would have been obvious to a person of ordinary skill in the art at the
> time of the invention to combine the metadata of Jones and Thackston with the XML of Serbinis. A

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person of ordinary skill in the art would have been motivated to do this to use representations on web applications.

Applicant traverses the above rejections for one or more of the following reasons:

(1)   Neither Jones, Thackston, nor Serbinis teach, disclose or suggest an XML representation of a revision block;

(2)   Neither Jones, Thackston, nor Serbinis teach, disclose or suggest a revision block that documents a change made directly by a user to a design document;

(3)   Neither Jones, Thackston, nor Serbinis teach, disclose or suggest a revision block that comprises a date of each change made by one or more users to the design document; and

(4)   Neither Jones, Thackston, nor Serbinis teach, disclose or suggest a revision block that comprises a revision number, a description of each change to a design document, and a user name for the user that made each change.

Independent claims 1, 10, and 19 are generally directed to the use of design document revision blocks. As set forth in the prior art, revision blocks for design documents (e.g., blueprints, drawings, etc.) in the architectural, engineering, and construction fields provide information relating to changes to the design document. In the prior art, when a design document was changed, the entire design document was transmitted with the revision block incorporated therein to describe the changes. Such a methodology was inefficient and slow. The present invention overcomes the difficulties of the prior art. Specifically, an XML representation of the revision block is captured. As set forth in the claims, the revision block documents a history of one or more changes made directly by one or more users to the design document. In addition, the claims provide that the revision block includes a date for each change made directly by the one or more users to the design document. Accordingly, the XML representation documents the history of changes and includes a date for each change made directly by a user.

The cited references do not teach nor suggest these various elements of Applicant's independent claims. In addition, Applicant notes that the combination of all of the claim elements as used with respect to design documents provide the context and scope of the claims. In this regard, Applicant submits that the invention must be examined as a whole and whether the "whole" claimed invention would have been obvious at the time of invention (see MPEP §2142). MPEP

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2141.01 provides that in determining the differences between the prior art and the claims, the question under 35 U.S.C. 103 is not whether the differences themselves would have been obvious, but whether the claimed invention as a whole would have been obvious. *Stratoflex, Inc. v. Aeroquip Corp.*, 713 F.2d 1530, 218 USPQ 871 (Fed. Cir. 1983); *Schenck v. Nortron Corp.*, 713 F.2d 782, 218 USPQ 698 (Fed. Cir. 1983)

Jones merely describes a document management system is adapted to operate with a process management system for recording and viewing metadata of a document. The document metadata is used to record resources referenced while the content of the document is developed. The resources are recorded in the document metadata to identify relationships between the resources and the content of the document. The document content includes links that reference the document metadata stored on a remote server. The resources recorded in the document metadata and the content of the document are simultaneously displayed on a user interface of the document management system to provide context for understanding document history. By storing document metadata and document content separately, the metadata of the document remains consistent even when multiple copies of the document are distributed over a network. (See Abstract).

However, Jones fails to provide for a revision block relating to a design document. In addition, Jones fails to provide a revision block that has a date for each change made by a user. Further, Jones fails to teach, disclose, or suggest an XML representation of a revision block. In rejecting the history of changes to the document, the Office Action relied on the metadata of Jones. However, Jones metadata fails to provide for changes to a particular design document. Instead, Jone's metadata relates to the data referenced by a document that refers to information about a document (see col. 4, lines 28-31). As set forth throughout Jones, the metadata relates to other resources that make up a task document (see col. 5, lines 27-50). Further, Jones' document is a task document that comprises a task performed by a user (see col. 6, lines 22-41). The document metadata is made up of document properties and document resources identified in the document metadata using URLs. Thus, contrary to that claimed, Jones' metadata does not reflect particular changes made directly by a user to a document.

FIG. 4 of Jones illustrates the metadata which comprises document properties 407, and document resources 408 (with the document resources comprised of resource properties 411 and relation properties 410). The document properties merely reflect a creation date of the document.

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Further, the document resources merely reflect the resources used to create the document and the dates such resources were created. However, none of the creation dates or metadata reflect the date a change is made to a document as specifically set forth in the claims.

The Office Action admits that Jones fails to teach the design document aspect of the invention and relies on Thackston to teach this claim element. Firstly, Applicant notes that Jones is clearly limited to process management systems/workflow systems and workflow documents (see col. 1, lines 23-col. 2, lines 41). In fact, the definitions in col. 4, lines 5-31 provide that a document is an object that contains or identifies URL information. The presently claimed design documents do not provide any such URL information or even remotely suggest such URL information. Further, the definitions provide for a task document that is created in order to complete an instance of a task of a process description with a process document containing task documents associated with an instance of a process description. The remaining text of Jones relates to the completion of a task and a task document reflecting such completion (see every figure of Jones). Examining the figures of Jones, one may clearly see the task based documents – see item 402 of FIG. 4 ("Document for Task 'X'"), item 502 of FIG. 5 ("Define the tasks that make up the process description), item 700 and 706 of FIG. 7 ("Workflow Manager: Status: creating a document for the "Make Offer" task"), etc.

In view of the clear limitations relating to workflow based documents, Jones does not relate to design documents as claimed. In addition, based on the clear workflow and task based limitations of Jones, Applicant submits that Jones cannot be combined with the design documents of Thackston. Instead, it would be impossible and unnecessary to designate resources and properties consistent with Jones to a design document of Thackston. In this regard, Jones cannot be combined with Tackston. The design document and revision block of a design document has a particular connotation in the design and AEC (architectural, engineering, and construction) industry. Jones limitations relating to workflow and task based documents teach away from such a connotation and use.

In addition to the above, the XML representation of the revision block allows for the efficient and easy transmission of the revision block across a network. The Office Action admits that both Jones and Thackston fail to teach the XML based representation. Instead, the Office Action merely relies on Serbinis' capability to transmit a response from a DMS system in XML. Applicant submits that such a response is not even remotely similar to an XML representation of a

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revision block for a design document having a history of changes to a document and a date for each change to the document. In this regard, the claims provide specific limitations relating to the XML representation and its contents. The mere use of XML in a document management system does not even remotely relate to the particularly claimed limitations. In the context of the claims, the XML representation reflects a revision block for a design document (amongst other limitations). No such design document limitations exist in Serbinis. Nor are the other claim limitations suggested or alluded to, implicitly or explicitly, by Serbinis.

In view of the above, the claims a whole must be evaluated in the context of a design document and revision blocks relating to such a design document. No such teaching, disclosure, or suggestion, exists in the prior art when the claims are viewed in this context as a whole.

Moreover, the various elements of Applicant's claimed invention together provide operational advantages over Jones, Thackston, and Serbinis. In addition, Applicant's invention solves problems not recognized by Jones, Thackston, and Serbinis.

Thus, Applicant submits that independent claims 1, 10, and 19 are allowable over Jones, Thackston, and Serbinis. Further, dependent claims 2-9, 11-18, and 20-27 are submitted to be allowable over Jones, Thackston, and Serbinis in the same manner, because they are dependent on independent claims 1, 10, and 19, respectively, and thus contain all the limitations of the independent claims. In addition, dependent claims 2-9, 11-18, and 20-27 recite additional novel elements not shown by Jones, Thackston, and Serbinis.

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III.   <u>Conclusion</u>

In view of the above, it is submitted that this application is now in good order for allowance and such allowance is respectfully solicited. Should the Examiner believe minor matters still remain that can be resolved in a telephone interview, the Examiner is urged to call Applicant's undersigned attorney.

Respectfully submitted,

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